

first more

LOTION

THE BERKSHIRE FOUNDATION

(A CHARITY TRUST)
INCORPORATED 1952

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TEL. 413-528-0531 OR 413-528-4871

June 19, 2003
To: Alison Wolfe
Marasco Newton Group
2801 Clarendon Blvd.
Suite 100
Arlington, VA 22201

Re: Housatonic River
"Rest of River"
Human Health Risk Assessment
Public Comment

Dear Ms. Wolfe,

I am president of The Berkshire Foundation, a small charity which gives grant monies to environmental and other community service groups in South Berkshire County.

We helped fund a documentary "Good Things to Life -- GE and PCBs" several years ago. The filmmaker, Mickey Friedman, captured our attention because his subject is the Housatonic which flows through our town.

Although the PCB's originate upstream, the potential risk for our area concerned us. Very little information on "the rest of the river" has been available. To learn more, we have participated in events coordinated by a river advocacy group Mr. Friedman co-founded, Housatonic River Initiative.

Now that I have introduced myself, on behalf of a community

JEAN BLACKMUR
ARNOLD BLACKMUR
SARAH FOGARTY
PATRICE MULLIN
ROBERTA WHEELER

charity which gives to other non-profits (we are directly and indirectly linked to many who stand to be affected by PCB contamination), I would like to comment on the EPA's report.

The EPA's risk assessment fact sheet raises more questions than it answers. For example:

--It says, "Consumption of home garden produce is not a health risk." Then, it gives a huge disclaimer -- "unless they have soil concentration levels higher than 2 ppm."

--It says, "Highest risks are from consumption of animal products" but vaguely states "contaminants MAY accumulate in milk and meat."

--The report contradicts itself when it says these two things -- "Although dairy cows DO NOT GRAZE in the floodplain, some of their corn silage and grass-based feed may be grown in contaminated soil," followed by "At beef and poultry farms, cattle and free-range poultry may ingest contaminated soil WHILE GRAZING the floodplain." Do they or do they not graze in the floodplain -- and what happens to silage/feed that is grown there and exported to non-floodplain farms? And what happens to their milk, which is mixed in with other milk at dairy cooperatives?

--Since both garden produce and animal products are produced in the floodplain known to contain PCB-contaminated soils -- on a river that constantly floods and covers the county's most fertile agricultural ground -- I question how plants are considered more or less "safe" whereas animal products are deemed at risk. People eat plants, cows eat plants and maybe some soil; people then eat the cows or drink the milk -- each time the risk for contamination increases and is cumulative.

--The report says fish and waterfowl consumption poses cancer risks which "greatly exceed EPA's risk range" as do frogs and turtles. But still, the report does not really clarify the risks enough re: farm animals and produce grown in the floodplain.

--The numbers are way too easy to manipulate. Such as: "If 20% of a farm's silage is grown in soil with an average PCB concentration of 10 ppm, this would be roughly equivalent to the risk estimated from 2 ppm." Yes, well, what if 100% of a farm's silage is grown in 10 ppm?! And what if I ate a lot of those squashes from that particular field as opposed to one where contamination levels are "roughly averaged?"

--Further, the report makes a distinction in "meal preparation method" pertinent to risk factors. What might that be? Is frying worse than steaming?

I just think the public deserves to hear a whole lot more. Who says 2 ppm -- averaged out -- is acceptable? I, for example, had 4th stage endometriosis, a serious health issue which is attributed to high levels of PCBs. I lived for 10 years about 6 miles from the river, but for years bought all my produce, including a large number of root crops (potatoes and

Page 3/Berkshire Foundation re: EPA/Housatonic River

onions) from a Great Barrington farm in the floodplain.

In closing I would like to make a RECOMMENDATION FOR THE PEER REVIEW COMMITTEE. I urge you to appoint at least one member from Housatonic River Initiative (see enclosure describing that group), which has worked in conjunction with the EPA from the start to document Berkshire County PCBs. Please also see (enclosed) my letter to the Editor of the Berkshire Eagle which applauds HRI's work - they are not tied to any public sector, have tremendous knowledge, and thus are the best ambassadors for protecting the Housatonic.

As a member of the Endometriosis Association, I would also like to see "a woman with endo" represented in some way. PCBs are absolutely the most serious risk factor known for this disease.

Thank you for hearing me out,

Patrice Mullin
Sincerely, Patrice Mullin
President and treasurer
Berkshire Foundation

Enc. 3

- About Berkshire Foundation
- Berkshire Eagle letter
- About HRI

The Berkshire Foundation is a small charity dispensing \$12,000-\$15,000 a year among two dozen non-profits. We tend to favor community service, youth groups, the environment, and the arts, in that order. Always, our preference is for Great Barrington and South County. If other heftier donors are able to make a greater difference, we often shy away. Our resources are small and we try to make the greatest impact with what we have.

Started by Robert K. Wheeler, the foundation was one of the very first charities in the area. Mr. Wheeler was the third generation to run Wheeler and Taylor, an insurance and realty company here. Originally endowed with monies from that company, the foundation has been wholly independent now for some time, although for years mail was still received for us at Wheeler and Taylor. Beyond that, there is no other connection, as the agency is no longer family run.

But, the foundation is family run, by Mr. Wheeler's two daughters, two granddaughters, and his son-in-law. We all serve non gratis, have but two or three meetings a year. There is no office help, in fact no office. We, therefore, ask for your patience in our reply to your requests. We have a new mailing address as of Jan. 03, at our secretary's home (Roberta Wheeler), and that address now appears on our letterhead.

Subj: **River keepers are not misguided**
 Date: 6/17/03 9:05:44 PM Eastern Daylight Time
 From: mulljones@aol.com
 To: bmontano@networx.com, mulljones@aol.com
 Sent from the Internet (Details)

copy of letter to editor of
 The Berkshire Eagle from
 Patrice Mullin supporting HRI

This article was emailed to you at the request of : **P. Mullin** - mulljones@aol.com

The sender included the following brief message :

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River keepers are not misguided

Tuesday, June 17, 2003 -

To the Editor of THE EAGLE:-

When Albert Einstein said, "Great spirits have always encountered violent opposition from mediocre minds," he recognized that brilliant earth-shakers such as Robert F. Kennedy Jr. and Lee's Tim Gray would forever provoke mundane critics.

Kennedy canoed at Wood's Pond June 5 (Housatonic Riverkeeper Launch Day), well over a year since he first announced full-fledged support of Gray's Housatonic River Initiative (HRI). Later, at a dinner in Lenox, Kennedy praised Gray as being the "paradigm" of grass-roots environmentalists, recognizing his scientific and legal milestones in the battle to rid the river of GE's PCBs, while also giving thanks for the bluegrass concert played by Gray and his band.

For the Eagle to editorialize (June 7) that RFK Jr. is "misguided" and to infer that HRI is less than the shining star it is -- blazing the lone initial crusade of pressuring GE to clean the river - is to side with shallow viewpoints.

The "settlement" The Eagle refers to was not sanctioned by HRI because it allowed a large toxic waste dump to remain near a Pittsfield elementary school, and only included a small portion of river cleanup.

There are, in contrast to the grassroots-based HRI, environmental elitist groups who claim they want a clean river, but G.E. is among their benefactors. Berkshirites who donate to HRI can rest assured this group is not so corrupted and is now among 100 "keepers" across the globe working to protect and enhance waterways.

Twice now in the Berkshires of late, Kennedy has been a rousing speaker, providing insight on how our planet is under siege by greedy corporations. Kennedy speaks rapidly, without notes, using analogies from history, nature, politics, his clan, geography -- and the Berkshires in which he has skied, camped, hiked and now canoed. Rather than misguided, I choose to think he is steered by a much greater power.

At any rate, Kennedy and HRI are a natural match, equals in the impassioned fight to protect water, air, trees, wildlife and ourselves from the politics of big money.

PATRICE MULLIN

Great Barrington, June 8, 2003

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Housatonic River Initiative

HRI: *Working for a fishable, swimmable Housatonic River since 19*
Member of the Waterkeeper Alliance, Licensed Riverkeeper&trac


housatonicriver.org
housatonicriverkeeper.org
housatonicriverinitiative.org

| about hri | what's new | the river | community | em: |
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HRI, Inc. - PO Box 321 - Lenoxdale, MA 01242 -tel: (413) 446-2520 - fax: (413) :

recent news
and features

The Declaration of Independence From PCBs

[click here](#)

GOOD THINGS TO LIFE: GE, PCBs, AND OUR TOWN

- feature-length documentary
film by Mickey Friedman:

was shown on

Saturday, December 7
at 7 PM, Mahaiwe Theater,
Great Barrington MA.



info: 499-6112,

or 528-9395,

[> more info](#)

September 2002 newsletter -

Now that GE is close to
completing the PCB clean-
up of the first half-mile of

**On June 5th, 2003 Bobby Kennedy Jr., preside
Waterkeeper Alliance will preside over the**

Housatonic Riverkeeper launch

**The official kick off camapaign to the Housa
Initiative's designation as a Riverkeeper. A
afternoon celebrity canoe race will be held
Pond. A reception, an evening supper and ta
held to benifit HRI. Tickets will be available**

Call Tim Gray @413-243-3353 if you want me

The first **PCB Congress** was held on
March 26-27, 2003 at Fairfield University
Fairfield, Ct.

PCB Impacted Communities United for Strength
[Please click here](#), for the current list of Congress Co-sponsors

This event is was co-sponsored and hosted by
the Fairfield University Department of Environmental Studies
Lisa Newton Ph.D.
David Brown Ph.D.

Recently a meeting among several citizens' groups that

6/19/03

<http://www.housatonic-river.com/>

address of
HRI, whom
we nominate
for Peer
Review

The film
we gave
a grant
to: